

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION**

MARLYN PANGATUNGAN, *et al*

CIVIL ACTION NO. 5:18-cv-00681

VERSUS

JUDGE ELIZABETH E. FOOTE

CADDO PARISH SCHOOL BOARD

MAGISTRATE JUDGE HAYES

**JOINT MOTION FOR ADDITIONAL FORTY-FIVE DAYS EXTENSION OF TIME
TO CONSUMMATE THE SAME AND TO FILE A STIPULATION OF DISMISSAL**

NOW INTO COURT, come Plaintiffs, MARLYN PANGATUNGAN, FLORDELIZA ASUNCION, MERLINA AYTONA, KATRINA BAESA, AMALIA BATONGBAKAL, ALONA GAYOSO, JANICE MAGAUAY, MARK MAGAUAY, ROMEO MANGAOANG, AND IREEN RIVERA, and Defendant, CADDO PARISH SCHOOL BOARD (“CPSB”), through their undersigned counsel, who move this Honorable Court for an additional 45-days extension of time to consummate the same and to file a Stipulation of Dismissal, as follows:

1.

On January 19, 2024, the Court entered an Order (Doc. 38) granting a 45-day Extension of Time to Consummate the Same and to File a Stipulation of Dismissal which expires on April 18, 2024.

2.

The parties are in need of additional time to finalize the terms of the written settlement agreement and obtain all necessary signatures.

3.

Considering the above, Plaintiffs' counsel respectfully requests that the time to file a stipulation of dismissal be extended forty-five (45) days from April 18, 2024, or until June 3, 2024.

WHEREFORE, Plaintiffs, MARLYN PANGATUNGAN, FLORDELIZA ASUNCION, MERLINA AYTONA, KATRINA BAESA, AMALIA BATONGBAKAL, ALONA GAYOSO, JANICE MAGAUAY, MARK MAGAUAY, ROMEO MANGAOANG, AND IREEN RIVERA, and Defendant, CADDO PARISH SCHOOL BOARD, PRAYS that the time to consummate the same and to file a Stipulation of Dismissal be extended by forty-five (45) days, or until June 3, 2024.

Respectfully submitted,

DOWNER, JONES, MARINO &
WILHITE, LLC

KEAN MILLER LLP

By: /s/ Allison A. Jones
Allison A. Jones, Bar No. 16990
401 Market Street, Suite 1250
Shreveport, LA 71101
Tel: (318) 213-4444
Fax: (318) 213-4445
Email: ajones@dhw-law.com
ATTORNEYS FOR PLAINTIFFS

By: /s/ Brian R. Carnie
Brian R. Carnie, Bar No. 30868
333 Texas Street, Suite 450
Shreveport, LA 71101
Tel: (318) 562-2700
Fax: (318) 562-2751
Email: brian.carnie@keenmiller.com
ATTORNEYS FOR DEFENDANT